

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>TRACY LAMONT ROBINSON</b>	<b>:</b>	<b>VIOLATIONS:</b> <b>18 U.S.C. § 641 (conversion of government funds - 3 counts) 18 U.S.C. § 2 (aiding and abetting) Notice of additional factors</b>

**INFORMATION**

**COUNTS ONE THROUGH THREE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this information:

1.       The U.S. Department of Labor was an agency of the United States.
2.       One division of the U.S. Department of Labor was the Wage and Hour Division, which was responsible for, among other things, the receipt of checks and money orders from various employers for federal labor regulation fees and payment obligations.
3.       On or about the dates listed below, at Philadelphia, in the Eastern District of Pennsylvania, defendant

**TRACY LAMONT ROBINSON**

knowingly converted to his own use or the use of another, and aided and abetted the converting of a thing of value of the United States, that is, the checks listed below, made payable to the U.S. Department of Labor and the Wage and Hour Division:

<u>Count</u>	<u>Check No.</u>	<u>Check Date</u>	<u>When and where cashed</u>	<u>Amount</u>
1	4402	09/24/03	10/01/03 at Citizens Bank	\$872.40
2	187527	10/14/03	10/21/03 at Citizens Bank	\$8,500
3	20089	10/24/03	10/27/03 at Citizens Bank	\$1,100

In violation of Title 18, United States Code, Section 641 and 2.

**NOTICE OF ADDITIONAL FACTOR**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

In committing the offenses charged in Counts One through Three of this information, defendant

**TRACY LAMONT ROBINSON**

Committed offenses in which the loss exceeded \$10,000 as described in U.S.S.G. § 2B1.1(b)(1).

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**PATRICK L. MEEHAN  
UNITED STATES ATTORNEY**